

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

X

VERONICA BROWN,

Plaintiff,

Docket No.:14-CV-5960 (SLT)(MDG)

-against-

DECLARATION IN SUPPORT

MARRIOTT INTERNATIONAL, INC.,

Defendant.

X

I, Daniel M. Stewart, hereby declare as follows:

1. I am an attorney duly admitted to practice in this Court and am a partner with the law firm of White, Fleischer & Fino, LLP.

2. I submit this declaration in support of the Defendant's Motion to Dismiss, served contemporaneously herewith.

3. Attached hereto as **Exhibit "A"** is a true and correct copy of MARRIOTT INTERNATIONAL, INC.'S Notice of Removal, dated October 9, 2014, with its exhibits.

4. Attached hereto as **Exhibit "B"** is a true and correct copy of plaintiff's Amended Federal Court Complaint, dated May 12, 2015. It is the operative pleading in this lawsuit.

5. Attached hereto as **Exhibit "C"** is the sworn affidavit of Carol Frensilli, with its exhibits: a true and accurate copy of the management contract for the hotel in question ("**C1**"); true and accurate copies of the Articles of Incorporation of Marriott St. Kitts Management Company Inc. ("**C2**"); and true and accurate copies of the certificate of incorporation for

Marriott St. Kitts Management Company Inc. and the proof of name change to “Luxury Hotels International of St. Kitts Limited” (“C3”).

6. Attached as **Exhibit “D”** is a certified copy of the Certificate of Incorporation for Royal St. Kitts Beach Resort Limited.

7. Attached as **Exhibit “E”** is the sworn factual affidavit of Jacques Hamru, General Manager of the hotel in St. Kitts where plaintiff’s accident occurred.

8. Attached as **Exhibit “F”** is the sworn affidavit of Adrian E. Scantlebury, Esq. a Kittian attorney.

Dated: New York, NY
August 28, 2015

WHITE FLEISCHNER & FINO, LLP

By:



Daniel M. Stewart (DMS 7989)

Attorneys for Defendant
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